



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

Ms. Mary Ann Dolehanty  
Permit Section Supervisor  
Michigan Department of Environmental Quality  
Air Quality Division  
P.O. Box 30260  
Lansing, Michigan 48909-7760

Dear Ms. Dolehanty:

Thank you for the opportunity to provide the Michigan Department of Environmental Quality (MDEQ) our comments on the draft construction permit for General Motors Flint Assembly LLC. (Permit number 173-13). Below are U.S. Environmental Protection Agency's comments:

- 1) On page 44, the draft permit contains conditions applying to FG-NETTING, which are the exiting emission units in the current light duty paint shop. Because this draft permit contains a netting analysis in which the new light duty paint shop is replacing the existing paint shop, MDEQ should revise the draft permit so that each particular existing emission unit affected by the netting demonstration be listed. Having each emission unit affected by the netting demonstration identified will assist in ensuring that once the new paint line commences construction, the facility will have effectively netted out of major source review.
- 2) EPA understands that General Motors may be modifying its plans for the light duty paint shop and implement a "transition period" where the existing and new paint shop lines will be in operation at the same time. Such a change would require an opportunity for public comment and review of the "transition period" emission limits to ensure that the project remains a synthetic minor modification during the "transition period" and into the future. Since this operating scenario is not part of this draft permit, MDEQ must public notice any permit modifications that provide for a "transition period."

We would like to thank you again for working with us in making sure that these issues were resolved in a timely manner. If you have any further questions, please feel free to contact Constantine Blathras, of my staff, at (312) 886-0671.

Sincerely,

Genevieve Damico  
Chief  
Air Permits Section